

EXHIBIT 18

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
JSAT Beyond Innovation LLC)	ICFS File No.
)	
Application for Authority to Launch and)	SAT-LOA-20250718-00178
Operate a Non-Geostationary Satellite Orbit)	
System in the Earth-Exploration Satellite)	
Service)	

REPLY TO OPPOSITION TO PETITION TO DENY

AST & Science, LLC (“AST SpaceMobile”) and Ligado Networks LLC (“Ligado”), in accordance with 47 C.F.R. § 25.154(d), file this reply to an opposition filed by JSAT Beyond Innovation LLC (“JBI”)¹ to a petition² AST SpaceMobile and Ligado filed to deny an application in the abovementioned docket.³

AST SpaceMobile and Ligado appreciate JBI’s acknowledgement in its Opposition that it does not object to “grant of the application subject to a condition not to claim protection from, nor cause harmful interference to, other authorized users of the L-band frequencies.”⁴ JBI fails to address, however, the central issue motivating the Petition to Deny. While it is true that Inmarsat, Viasat’s subsidiary, has coordinated access to channels in the L-band, these channels are coordinated only for Mobile Satellite Service (“MSS”) use and not Intersatellite Service

¹ JSAT Opposition to Petition to Deny, ICFS File No. SAT-LOA-20250718-00178 (filed December 3, 2025) (“Opposition”).

² AST SpaceMobile and Ligado Petition to Deny, ICFS File No. SAT-LOA-20250718-00178 (filed Nov. 18, 2025) (“Petition”).

³ JSAT Beyond Innovation LLC Application for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Earth-Exploration Satellite Service, ICFS File No. SAT-LOA-20250718-00178 (filed July 18, 2025) (“Application”).

⁴ Opposition at 3.

(“ISS”). Nor has Ligado (or, to Ligado’s knowledge, any other party authorized by the Commission or foreign regulatory authority to operate in L-band) otherwise agreed that Inmarsat, or anyone else, can use its coordinated L-band spectrum for ISS.

JB-I is thus asking to operate a constellation of satellites in a band where such service has not been authorized, claiming that it is entitled to the same treatment as a previous applicant (Loft Orbital) without having made any of the specific showings made by that applicant, and without providing any specific information as to how it intends to operate in the band. These are specific allegations of fact sufficient to show that grant of the application is inconsistent with the public interest. Moreover, JB-I has failed to file any such responsive information in response to AST SpaceMobile and Ligado in its Petition or otherwise. Absent any such showing, the Commission should, as requested by AST SpaceMobile and Ligado, deny JB-I’s application.⁵

JB-I’s Opposition thus does not provide any substantial reason to deny the Petition. Accordingly, the Commission should deny the Application unless JB-I submits (1) an analysis demonstrating that it will not cause harmful interference to other current and planned L-band systems, and (2) a full set of space-to-space transmit and receive channels planned for the Pelican satellites. This is the only way to be even minimally assured that JB-I can, in fact, operate on a non-interference basis. If JB-I does so, then any grant of the Application by the Commission should be conditioned consistent with ensuring that JB-I’s services will be operated in accordance with ITU RR Article 4.4, which requires that JB-I’s ISL use “shall not cause

⁵ These responses apply equally to the arguments raised by Viasat relevant to JB-I’s showing (or lack thereof) in its letter filed in this proceeding. *See* Letter from J. Taubman, VP & Deputy Chief Government Affairs & Regulatory Officer, Viasat, Inc. to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-LOA-20250718-00178 (Nov. 25, 2025).

harmful interference to, and shall not claim protection from harmful interference caused by, a station operating in accordance with the provisions of Radio Regulations and US ToFA.”

Respectfully submitted,

/s/ Jennifer A. Manner

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December 15, 2025

cc: Tai Ishikawa, JSAT Beyond Innovation LLC
Danielle Pineres, Planet Labs PBC

AFFIDAVIT

Our names and positions are (1) Jennifer A. Manner, Senior Vice President, Regulatory Affairs and International Strategy, AST & Science, LLC and (2) Vernon G. Ross, Vice President, Legal and Regulatory Affairs Ligado Networks LLC. We are signing this affidavit in support of a Reply (“Reply”) to an Opposition to a Petition To Deny an Application to the Federal Communications Commission filed by JSAT Beyond Innovation LLC. Each of us hereby certifies under penalty of perjury that the factual statements in the Reply are true and accurate to the best of my knowledge, information and belief.

/s/ Jennifer A. Manner

Jennifer A. Manner

/s/ Vernon G. Ross

Vernon G. Ross

December 15, 2025

CERTIFICATE OF SERVICE

I, Jeff Carlisle, certify that on December 15, 2025, a copy of the foregoing pleading was served on the following individuals via U.S. Postal Service, First Class Mail:

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